



ARIZONA DEPARTMENT OF ECONOMIC SECURITY

1789 W. Jefferson • P.O. Box 6123 • Phoenix, AZ 85005

Janet Napolitano
Governor

Tracy L. Wareing
Director

October 16, 2007

WIA GUIDANCE LETTER # 02-07

SUBJECT: Submittal of Local Workforce Investment Area Plans for Program Years 2008 and 2009

REFERENCE: P.L. 105-220, Section 118; 20 CFR 661.305 (a) (1); 661.345; 661.350

BACKGROUND: Under the Workforce Investment Act (WIA) of 1998, each Local Workforce Investment Board (LWIB), in partnership with the chief local elected official, is required to submit a Five-Year Local Plan for WIA Title IB Adult, Youth and Dislocated Worker Programs and the Wagner-Peyser Program. The current five-year planning cycle began on July 1, 2005 and will end on June 30, 2010.

In July 2005, due to the anticipated reauthorization of WIA and in alignment with the U.S. Department of Labor requirements for State Planning, the Governor's Council on Workforce Policy (GCWP) only required the first two-years of the five-year planning cycle. Local Plans for the first two years of the five-year planning cycle expired on June 30, 2007. Earlier this year, the GCWP approved extending the local plans until June 30, 2008, at which time the state anticipates completing the review and approval process of these local plans for Program Years 2008 and 2009 of the Five-Year planning cycle.

GENERAL GUIDANCE FOR THE LOCAL PLANS:

Emphasis in the Local plans should be placed on how the system has improved and can meet Governor Napolitano's vision for workforce investment, as well as, the new national strategic direction. Therefore, Governor Napolitano's vision and the national strategic direction should be reflected in the LWIBs priorities.

The goals of the national strategic direction for the workforce investment system include: increased state and local flexibility, increased integration for a stronger One-Stop system, streamlined governance leading to greater efficiencies, and increased access to post-secondary education. Additional information on the new National Strategic Direction can be found in TEGL 13-06.

According to WIA, local plans shall be consistent with the state plan. To assist local boards in aligning local plans with the Governor and GCWP's vision for workforce development, the final version of Arizona's 2 Year Plan is available at www.azcommerce.com/jobtraining/strategicplan.asp.

The attached guidance was developed for local boards to use in developing their new 2 Year Local Plan for Program Years 2008 and 2009.

These procedures pertain to the WIA Two-Year Local Plan for the 14 designated local workforce investment areas and will be effective July 1, 2008. It is important to closely follow the attached Local Planning Guidance and the submission procedures provided below. Local plans that are inconsistent with the guidance and requirements risk not being approved.

DEVELOPMENT OF PLAN:

The Local Workforce Investment Board, along with the One-Stop partners and other stakeholders, has the responsibility of creating and articulating the vision that should outline the overarching goals and objectives of the local workforce investment service delivery system. The plan should represent a collaboration of efforts. Through full participation and collaboration with partners and communities, decisions should be made that will assist in developing a strategic local plan that will facilitate the delivery of employment and training services to the customers in the local workforce investment area.

PUBLIC COMMENT:

Prior to submission, the local plans must provide notice to the public of the plan's availability for comment, through such means as public hearings and the local news media. Local Workforce Investment Boards are expected to involve business, organized labor, local public officials, community-based organizations, WIA service providers and other stakeholders in the review of their plan. This public comment period shall consist of a statutorily mandated 30 day public review and comment period.

ACTION REQUIRED:

Local Plans due to the State:	March 7, 2008
Review by State staff/GCWP:	March 10 – April 4, 2008
GCWP approval:	May 2008
Current Local Plan Expires:	June 30, 2008
Approved Local Plan Effective:	July 1, 2008

SUBMISSION OF PLAN:

- The responses to the questions should be entered below the question. The questions should be in bold, and each response should be no more than three (3) pages in length.
- Pages in the local plan should be numbered.
- Use a size 11 or larger font, single spaced on 8.5 x 11 white paper.
- Four (4) hardcopies must be mailed. One (1) hardcopy of the local plan with **original** signatures on the signature page and three (3) hard copies must be mailed to:

Arizona Department of Economic Security
WIA Section Manager
1789 West Jefferson
Site Code 920Z
Phoenix, Arizona 85007

LOCAL PLAN REVIEW PROCESS:

Upon receipt of the plan by the State, the document will undergo an internal review. An email will be sent to the local area contact person to inform them of who will be handling the state review of the local areas plan. In the interim, if you have questions concerning the plan template or submission procedures, you may contact Carolyn Ufford at (602) 542-3957.

APPROVAL OF LOCAL PLAN:

All local plans submitted to the State will be considered approved 90 days following submission, or at any time written approval is provided by the State if the local plans: 1) are written in accordance with the guidelines, that are consistent with and meet all provisions of the Workforce Investment Act of 1998 and 2) have no substantive issues identified by the State, and establish acceptable levels of performance. A letter indicating approval of the plan will be mailed to the director of the WIA administrative entity.

If you have any questions please contact Carolyn Ufford, WIA Section Manager at (602) 542-3957 or by email at CUfford@azdes.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carolyn Ufford', with a stylized flourish at the end.

Carolyn Ufford
WIA Section Manager
Employment Administration

Attachment: Local Planning Guidance

**LOCAL PLANNING GUIDANCE
FOR
ARIZONA LOCAL WORKFORCE INVESTMENT AREAS
PROGRAM YEARS 2008 AND 2009 PLAN**

Section I**PLAN DEVELOPMENT**

1. Describe the involvement of the Chief Local Elected Official (CLEO), the Local Workforce Investment Board (LWIB) and stakeholders in the development of the Plan.
2. Describe the process used to make the Plan available to the public, as well as key stakeholders, and the outcome resulting from review of public comments. Describe measures taken to include or address all comments received within the review period. [A copy of the published notice should be included as **Appendix A**. (For Internet publication, a screen print is acceptable.) Also include a copy of any distribution list used for notification of key stakeholders.] Any comments related to the Plan should be included as **Appendix B**.

Section II**GOVERNANCE STRUCTURE**

1. Describe the role of the Chief Local Elected Official (CLEO) in the governance and implementation of WIA in the local area. In local areas consisting of more than one unit of government, indicate the decision making process between the local elected officials.
2. Identify the entity responsible for the administrative functions in the delivery of WIA services. Provide contact information for the administrative entity and a copy of the agreement between the CLEO and administrative entity reflecting the designation and responsibilities. Administrative entity contact information and copies of the agreement should be included as **Appendix C**.
3. Identify the entity responsible for the disbursement of grant funds, as determined by the CLEO. Provide contact information for this fiscal entity, as well as a copy of the agreement between the CLEO and the entity, which reflects the fiscal agent designation. Fiscal agent contact information and copies of the agreement should be included as **Appendix D**.
4. Identify the One-Stop Operator. Describe the process for selection and the relationship of the One-Stop Operator to the LWIB (i.e.: when and how the One-Stop Operator was selected.) If the One-Stop Operator is a consortium of three or more One-Stop partners, include copies of the consortium agreement as **Appendix E**.
5. Provide an organizational chart (**Appendix F**) that delineates the relationship between the agencies involved in the workforce development system, including the CLEO, administrative entity, fiscal entity, One-Stop Operator and the required/optional One-Stop partner programs and lines of authority.

Section III

ECONOMIC INDICATORS

Provide a detailed analysis of the local economy, the labor pool, and labor market. The LWIB should use LMI resources such as the *Training and Education Research Model (TERM)*, *County Indicators for Arizona, etc.*) The analysis must include:

1. The current makeup of the local economic base by industry.
2. Industries and occupations most critical to the Local Workforce Investment Area (LWIA) and which occupations are expected to grow or decline in the short term and over the next decade.

Section IV

PLANNING AND EVALUATION

Note: Presently LWIBs self-define and self-declare comprehensive One-Stop sites; however the GCWP is in the process of developing Arizona's chartering process that will require modifications to local plans upon implementation.

1. Describe the Arizona Workforce Connection system in your LWIA. Provide strategic information about the availability and coordination of Arizona Workforce Connection services, including:
 - a) Number and type of sites (i.e.: comprehensive, affiliate, electronic access) and site locations.
 - b) Factors used to assess the effectiveness of such configuration. Include factors for determining a location's business hours and the types of services offered.
2. Describe any regional workforce development partnerships. Describe the purpose of these partnerships, the roles, goals and objectives along with the activities (such as regional planning, information sharing and/or coordination activities) that will help improve performance.

Section V

SERVICE DELIVERY

Delivery System

1. Provide a description of the service delivery network; include the services provided by each partner agency.
2. Describe overarching service delivery strategies, including the following:
 - a) The strategy for seamless service delivery including: transition between core, intensive and training services and referral to partner services for both businesses and individual customers.
 - b) The type and availability of training and employment activities and supportive services available in the Local area. Include a description of how these were assessed/determined.
 - c) Describe the coordination of Arizona Workforce Connection partner services. Include copies of the Memorandum of Understanding and Resource Sharing Agreements (**Appendix G**) between the LWIB and each partner in the local workforce investment system, as required in WIA Section 118(b)(2)(B).

Adults and Dislocated Workers

Describe any plans for transferring of funds between the Adult and Dislocated Worker programs. If planned, include the circumstances applicable to a transfer request, the measures to assure no loss of service to the original program population, and the expected impact on program performance.

Core Services

Describe how the LWIB ensures adults and dislocated workers have universal access to the minimum required cores services. Describe how partner services are integrated to avoid duplication of core services.

Intensive Services

1. Describe measures taken to ensure intensive services are provided to adults and dislocated workers who meet the criteria in WIA Section 134(d)(3)(A).
2. Describe your local co-enrollment process between WIA dislocated worker program and TAA.
3. Describe local policies regarding self-sufficiency, including the process for establishing, monitoring compliance with and updating policy. Identify the local self sufficiency standards approved by the LWIB for employed adults and dislocated workers as a percentage of the Lower Living Standard Income Level (LLSIL). Describe how your LWIB ensures the self-sufficiency level in your area is reflective of the current labor market information available.

Training Services – Adult and Dislocated Worker

1. Describe local Individual Training Account (ITA) policy, including the current threshold for each ITA. Include procedures to ensure that exceptions to the use of ITAs, if any, are justified. Describe measures to leverage resources to provide increased access to training opportunities.
2. Describe how the Eligible Training Provider System is used to provide improvement of education and training opportunities in response to the needs of business and industry. Include the policies and procedures to determine eligibility of training providers, and processes to update or revise system information.

Service to Specific Populations

Describe the local strategies to ensure availability of services and training to meet the needs of the following:

Dislocated Workers	Displaced Homemakers	Low-Income Individuals	Migrant Workers	Women and Minorities
Individual training for non-traditional employment	Veterans	Public Assistance recipients	Individuals with multiple barriers	Older Individuals
Persons w/limited English proficiency	Persons with disabilities	Ex-Offenders	TAA	Dropouts
				High School graduates with low functional levels

Priority of Service

1. Describe criteria to determine whether funds allocated for employment and training activities are limited and the process by which the Arizona Workforce Connection Operator will apply priority of service.
2. Describe the LWIB's policies and procedures for priority of service for Arizona Workforce Connection Operators. Identify the priority groups established for Title IB adult and dislocated worker services within your local area.
3. Describe local strategies to ensure Jobs for Veterans Priority Compliance.

Rapid Response (RR)

1. Identify the local area's Rapid Response team and their roles and functions. Identify your local Rapid Response policies, including the minimum threshold number of affected workers your LWIB has approved for Rapid Response services to be provided to a company experiencing a layoff, reduction in force or closure.
2. Provide a general project description of services to those affected by a mass lay off; include any overarching strategies and funding.

Youth

1. Describe the strategy to ensure eligible youth have the opportunity to develop and achieve career goals through education and workforce training. Include discussion regarding youth most in need, such as: out-of-school youth, homeless youth, youth in and aging out of foster care, youth offenders, children of incarcerated parents, migrant and seasonal farm worker youth, and other at-risk youth.
2. Describe local efforts to promote collaboration between the public workforce system, education, human services, juvenile justice, and others to better serve youth that are most in need and have significant barriers to employment. Additionally, describe local efforts to successfully connect youth to the education and training opportunities that lead to successful employment.
3. Describe the strategy to provide initial intake, objective assessment, case management, individual service strategies and eligibility assessment for youth.
4. Describe the design framework for youth programs that includes the following components.
 - Preparing youth for post-secondary education;
 - Connecting academic and occupational learning;
 - Preparing youth for unsubsidized employment opportunities; and
 - Connecting youth to the business community through intermediary entities.
5. Describe strategies to incorporate the required youth program elements within the design framework. Elements to include are:
 - Tutoring, study skills training, instruction leading to secondary school completion, including dropout prevention;
 - Alternative secondary school services;
 - Summer employment opportunities linked to academic and occupational learning;

- Paid and unpaid work experiences;
 - Occupational skill training;
 - Leadership development opportunities;
 - Comprehensive guidance and counseling;
 - Adult mentoring;
 - Supportive Services; and
 - Follow-up services.
6. Identify the additional 5% non-economically disadvantaged youth barrier, include the process and criteria used to determine “serious barriers to employment”, and the local process to track enrollment of non-economically disadvantaged youth per Workforce Guidance Letter #04-05.
 7. Identify the local process that is used to track out-of-school youth enrollments and expenditures to meet the 30% out-of-school youth minimum expenditure requirement.
 8. Identify the 6th youth barrier(s) for “individuals (including youth with a disability) who required additional assistance to complete an educational program, or to secure and hold employment,” as identified by the LWIB.

Business Services

1. Describe the role and responsibilities of your Business Service Representative/Team in your local area. Include active local business partnerships and established collaborations with Employment Service staff, local economic development entities and the community colleges.
2. Describe what is being done to place job seekers in positions within Arizona’s industries of opportunity and outline the specific goals established to increase the number of placements in targeted industries.
3. Describe current and/or planned use of WIA Title IB funds for apprenticeship training.
4. Describe the approach for coordinating training activities with the Arizona Job Training Program in your local area and what strategies are in place to connect with local businesses.

Faith-Based and Community Organizations

1. Describe service coordination with faith-based and community organizations.
2. Describe activities designed to create and strengthen your local area’s partnerships with faith-based and community-based organizations and their customers. Provide specifics on the organizations with whom you coordinate and/or partner.

Section VI

ADMINISTRATION

Program Administration

1. Describe any local policies or guidelines implemented to support WIA Title IB program operations that are not addressed elsewhere in the Plan. Include information regarding the purpose, development, implementation, and monitoring of such policies.

2. Describe the local process and procedures that will be utilized to monitor sub-recipients (including OJT contractors) for program and EO compliance.

Fiscal Administration

1. Describe the administration of WIA funds used by the LWIB. Include oversight responsibilities for WIA funds, Arizona Workforce Connection and other workforce development resources.
2. Describe measures to eliminate duplicative administrative costs being used by the LWIB.

Procurement

1. Describe the competitive and non-competitive process used to award grants and contracts for activities under Title IB of WIA, including how potential bidders are made aware of the availability of grants and contracts. Include the process to procure training services that are made as exceptions to the ITA process.
2. Describe the criteria used for awarding grants for youth activities, including criteria used to identify effective or ineffective youth activities and providers of such activities.

Appeals Process

Describe the procedures established for providers of youth or training services to appeal a denial of eligibility, a termination of eligibility or other action by the LWIB or One-Stop Operator.

Equal Opportunity and Affirmative Action

1. Describe the system to assure compliance with all applicable federal and state laws and regulations including those regarding debarment, tax liabilities or delinquent obligations, the Federal Lobbying Act, Minority and Women Business, discrimination or harassment.
2. Provide contact information for the Equal Opportunity (EO) Officer in the local area.
3. Describe how the identity of the EO Officer and the appeal process are made available.
4. Describe the appeal process for assuring that no individual shall be excluded from participation, denied benefit or employment, nor subjected to discrimination under or in connection with, any program or activity for any reasons, including but not limited to: race, color, religion, national origin or citizenship, age, disability, political affiliation or belief.

Section VII

PERFORMANCE

Performance Management

1. Describe the monitoring process and oversight criteria and procedures utilized to move the workforce investment system toward LWIA goals.
2. Describe how the LWIA identifies areas needing improvement and any processes in place to address deficiencies.

Negotiated Performance

1. Describe how levels of negotiated performance ensure and support the LWIA vision.
2. Provide a listing of the PY 2008 LWIA performance standards for the Adult, Dislocated Worker, and Youth Programs negotiated with the State WIA Section, as **Appendix H** in the Plan.

APPENDICES

Appendix A – Published Notice

Appendix B – Plan Review Comments

Appendix C – Administrative Entity Agreement

Appendix D – Fiscal Agent Agreement

Appendix E – One-Stop Operator Consortium Agreement

Appendix F – Organizational Chart

Appendix G – Memorandum of Understanding and Resource Sharing Agreement

Appendix H – Performance Measures and Levels for PY 2008

Appendix I – Assurances

Appendix J – Local Plan Signature Page

LWIB/LWIA ASSURES (Appendix I):

As a condition to the award of Workforce Investment Act funds, the local grant recipient assures that it will comply fully with the provisions of the following:

- 1) That it will establish, in accordance with Section 184 of the Workforce Investment Act (WIA), fiscal control and fund accounting procedures necessary to ensure the proper disbursement of, and accounting for funds paid to the local area through the allotments made under Sections 128 and 133.
- 2) That veterans will be afforded employment and training activities authorized in Section 134 of the Workforce Investment Act, to the extent practicable. (112(b)(17)(B).
- 3) That it will comply with the confidentiality requirements of Section 136(f)(3).
- 4) That no funds received under the Workforce Investment Act will be used to assist, promote, or deter union organizing (Section 181(b)(7).)
- 5) That it will comply with the nondiscrimination provisions of Section 188, including compliance with the State Methods of Administration (Section 188.)
- 6) That it will collect and maintain data necessary to show compliance with the nondiscrimination provisions of Section 188 (Section 185.)
- 7) That it will comply with the grant procedures prescribed by the Secretary (pursuant to the authority at Section 189(c) of the Act) which are necessary to enter into grant agreements for the allocation and payment of funds under the Act. The procedures and agreements will specify the required terms and conditions and assurances and certification, including, but not limited to, the following:
 - a) General Administrative Requirements:
 - 29 CFR part 97 – Uniform Administrative Requirements for State and Local Governments (as amended by the Act)
 - 29 CFR part 96 (as amended by OMB Circular A-133) – Single Audit Act
 - OMB Circular A-87 – Cost Principles (as amended by the Act)
 - b) Assurances and Certifications:
 - SF 424 B – Assurances for Non-construction Programs
 - 29 CFR part 31, 32 – Nondiscrimination and Equal Opportunity Assurance (and regulation)
 - CFR part 93 – Certification Regarding Lobbying (and regulation)
 - 29 CFR part 98 – Drug Free Workplace and Debarment and Suspension Certifications (and regulations)
 - c) Special Clauses/Provisions:
 - Other special assurances or provisions as may be required under Federal law or policy, including specific appropriations legislation, the Workforce Investment Act, or subsequent Executive or Congressional mandates.
- 8) That veterans' services provided with Wagner-Peyser Act funds will be in compliance with 38 U.S.C. Chapter 41 and 20 CFR part 1001.
- 9) That it developed, and will continue to develop, this Plan in consultation with local elected officials, the local workforce board, the business community, labor organizations and other partners.

- 10) That it will meet the regulatory requirements to procure youth services by a competitive process as outlined in the WIA regulations and State Youth Procurement Guidelines.
- 11) That the LWIB will meet a minimum of four times per year, or once each quarter.
- 12) That all LWIB business will be conducted in accordance with the Arizona Open Meeting Law.
- 13) That it will comply fully with the nondiscrimination and equal opportunity provisions of the following laws:
 - Section 188 of the Workforce Investment Act of 1998 (WIA), which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participation in any WIA Title I financially assisted program or activity;
 - Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color, and national origin;
 - Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
 - The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
 - Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs. The grant recipient also assures that it will comply with 29 CFR part 37 and all other regulations implementing the laws listed above. This assurance applies to the grant recipient's operation of the WIA Title I - financially assisted program or activity, and to all agreements the grant recipient makes to carry out the WIA Title I – financially assisted program or activity. The grant recipient understands that the United States has the right to seek judicial enforcement of this assurance.
- 14) That program services will be provided and funds will be spent in accordance with the Workforce Investment Act and Wagner-Peyser Act legislation, regulations, written Department of Labor and State of Arizona guidance, and all other applicable Federal and State laws. Local plan contents cannot override the legislative and regulatory requirements of the Workforce Investment Act and/or the Wagner-Peyser Act.

Local Plan Signature Page (Appendix J)
Program Year 2008 through Program Year 2009
WIA Title IB

We, the undersigned, do hereby approve and submit this Local Plan for the Workforce Investment Act (WIA) Title IB Programs for the:

Local Workforce Investment Area (LWIA)

Submitted on behalf of the Local Workforce Investment Board (LWIB) and Chief Local Elected Official(s) for this Local Workforce Investment Area.

Signature – Chief Local Elected Official

Date

Name and Title

Signature – Chief Local Elected Official

Date

Name and Title

Signature – LWIB Chair

Date

Name and Title

Approved on behalf of the State of Arizona:

Signature – Chairman
Governor's Council on Workforce Policy

Date